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**Sent:** Monday, December 20, 2021 4:36 PM  
**To:** PSD - Comprehensive Energy Plan <PSD.ComprehensiveEnergyPlan@vermont.gov>  
**Subject:** CEP comments

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## ACRPC Comments

### General

It would be valuable to identify the key actors in more of the recommended actions presented.

Addison County municipalities are often excluded from energy programs related to “equitable solutions.” The CEP should account for regional differences while not excluding households in need due to Town median income metrics.

Greater transparency into carbon credits and energy purchased from outside the state is crucial in understanding Vermont’s real emissions impacts and our energy use impacts on communities outside of VT.

Community owned or cooperative distributed generation is experiencing a decline in government support that will virtually eliminate the possibility of additional projects in the future. These projects create opportunities for community participation and buy-in to a process that has traditionally been controlled by state level organizations. This in turn results in greater engagement and positive public opinion around new generation facilities because it is driven by community members rather than unknown external entities. What programs or incentives could the CEP support to continue this valuable form of community generation?

The CEP places emphasis on equity, but there is little discussion on how greater equity will be pursued through the recommendations and actions of the plan. Beyond weatherization, what programs will be developed to enable low income and vulnerable communities to participate in this transition?

There is also a distinct lack of discussion of potential harms related to the rapid deployment of new technologies for vulnerable communities inside and outside Vermont. The CEP has an opportunity to educate the public and to create a forum for innovation on this point.

While it is understandable that the CEP avoids identifying specific technologies that will be required for achievement of the stated goals, there is a lack of discussion on the necessity for energy storage and the potential value of hydrogen. Solar and wind are discussed regularly, and lithium batteries are also mentioned, but if transmission upgrades are to be avoided, storage will

be critical to our future grid, and a life cycle assessment of existing battery technology indicates serious consequences of rapid deployment. Therefore, why is there so little discussion of potential alternatives to address our growing storage needs in the state?

## Chapter Specific

Chapter 3: Claims support for ongoing enhanced energy planning. It would be helpful to have additional information and guidance on how EEPs benefit municipalities, and how strong these documents are when tested.

Chapter 4: Suggests that coordinated planning is required in how distributed generation is deployed and interconnected. Guidance on what the requirements of proper deployment look like and a platform for coordination would be valuable. For example, who needs to coordinate? Is there a spatial limit on generation? How must interconnections occur to create a viable distributed system?

Chapter 4: Curtailment is discussed in the context of load management and reducing the need for transmission improvements. How is this balanced with the loss in potential GHG reductions? If curtailment occurs at increasing rates, wouldn't the benefits of renewable energy systems be truncated?

Chapter 4: I would like to voice strong support for the potential solution of requiring all distribution utilities to create and maintain distribution hosting capacity maps that allow for planning of location of any DER that may increase or decrease available capacity.

Chapter 5: The pathways sections are bisected by the "Funding Transportation Climate Mitigation Section. It may be more reader friendly to group all of the pathway sections together.

Chapter 5: Does the 5.5 pathway consider the full lifecycle of biofuels and their impact on food systems? Traditional biofuels have been shown to be inefficient and a poor use of our agricultural lands while producing the same amount of GHG emissions over their life cycle.

Chapter 5.5.1: The suggested feebate program would negatively impact low income communities and very little is said about how these impacts could be avoided.

Chapter 5.5.2: These alternative fuels perpetuate the dominance of fossil fuels in our transportation sector with small GHG reductions. How do we ensure a partial transition to this state does not occur?

Chapter 5.6: There is a strong dependence on TCI-P participation. How does this work with a lack of participation by other states?

Chapter 6: This and other chapters detail several exciting initiatives and programs. An expected implementation timeline would be valuable to support decision making around energy projects at all levels.

Chapter [6.4.2.5](#): What is the long term impact of promoting biomass based diesel? Are there any restrictions on the type of biomass used? How is this expected to impact agricultural practices? Will biodiesel be produced locally or lock the state into continued imports for fuel?

Chapter [7.3.2.4](#): The discussion of RECs in this section does very little to explain how RECs benefit the consumer or how they support progress towards GHG emission goals. It is also unclear why Vermont has chosen to include a cap on the price of Tier I prices and how this impacts customers and the goals of the CEP.

Chapter [7.6.1.1](#): With dropping prices for net metered energy, what is the incentive for private citizens to invest in energy projects? Is there a recommended format for community participation in energy generation into the future? Why or why not?

## Page Specific

Pg ES-3 paragraph following bullets: Uses “In other words” repetitively and to poor effect.

Pg ES-4 p.2: Second sentence is poorly worded and could be more effective if made into two statements.

Pg ES-4 p.3: Last sentence, verb tenses are not consistent, should change “building” to “builds”

Pg 1-1 p.2: “The CEP also serves a policy tool” → serves as a policy tool or serves a policy function

Pg 1-1 p.3: Uses and twice in the same list

Pg 1-1 sector goals: is the 75% from renewable energy goal expected by 2032? Please clarify the timeline for the second part of this goal.

Pg 2-4 p.5: misspelling of services in “Near zero carbon electricity **servces**”

Pg 2-8 p.3: could we use DMV and vehicle inspection data to obtain more reliable data with greater spatial accuracy?

Pg 2-10 p.3: remove only from one of the two positions and correct spelling of tasked - “and includes only the net costs only to the entity **tased** with”

Pg 2-13 p.2: need to remove “for” from “seeks to lay **for** the foundation for how these considerations”

Pg 5-47 p.1 the action is not italicized like other actions

Pg 5-35 sec 5.7: first line needs “made by” removed before Vermonters

Pg 5-48 p2: “2020 Vermont **Policy** Transit Policy plan recommendations”

Pg 7-1 p.2: What is Chapter 2x ?

Exhibit 7-2: the Title of the chart has a typo in “Residentail”

Thank you,  
Maddison

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